

0045

Outgoing  
C0410002  
K

**From:** Ingrid Wieser  
**To:** OGMCOAL  
**Date:** 11/16/2009 5:16 PM  
**Subject:** Fwd: Northwater Springs Inspection  
**Place:** OGMCOAL  
**Attachments:** Comments to Ingrid Wieser.doc

Hi- Please scan this attachment as comments to inspection report# 2164 for SUFCO. Thanks!

>>> Ingrid Wieser 11/16/2009 5:14 PM >>>

All-

Please see the attached DOGM inspection report # 2164 and comments from Leland Roberts regarding the SUFCO site visit to Northwater springs on October 19th.

Leland- Thank you for providing the clarifications.

Ingrid Wieser

>>> "Roberts, Leland" <[LRoberts@archcoal.com](mailto:LRoberts@archcoal.com)> 11/13/2009 2:28 PM >>>  
Ingrid,

Sufco would like to address some items in the trip report that you sent out. Please find attached a list of items that we would like to clarify or comment on. Please feel free to contact me with any questions that you might have.

Thank you,  
Leland

Leland Roberts  
Environmental Engineer  
CFC, Sufco Mine  
(435) 286-4483

<<Comments to Ingrid Wieser.doc>>

\*\*\*\*\* Email Disclaimer \*\*\*\*\*

The information contained in this e-mail, and in any accompanying documents, may constitute confidential and/or legally privileged information. The information is intended only for use by the designated recipient. If you are not the intended recipient (or responsible for delivery of the message to the intended recipient), you are hereby notified that any dissemination, distribution, copying, or other use of, or taking of any action in reliance on this e-mail is strictly prohibited. If you have received this e-mail communication in error, please notify the sender immediately and delete the message from your system.

#### 1. Permits, Change, Transfer, Renewal, Sale

5<sup>th</sup> Sentence that starts with, "In accordance" Sufco submitted a letter to Mr. John R. Baza, Division Director Division of Oil, Gas and Mining and Mr. Jerry D. Olds, P.E. Utah State Engineer Utah Division of Water Rights on November 14, 2006 challenging the findings of material damage.

6<sup>th</sup> sentence that starts with "Piezometers established" the water level has lowered in depth between 2 and 20 feet below the surface.

7<sup>th</sup> Sentence that starts with "Several strategies" Sufco proposed or attempted the mentioned items on a pilot scale to evaluate their potential for restoring the surface flow of the springs.

8<sup>th</sup> Sentence that starts with "An exploratory" Castlegate is one word.

#### 4.d Hydrologic Balance: Water Monitoring

2<sup>nd</sup> paragraph, Plate 7-3 does not show Pines 105 or 310/311 as part of a perennial stream reach. It is not a perennial stream but a wet spring discharge area.

#### 9. Protection of Fish, Wildlife and Related Environmental Issues

2<sup>nd</sup> paragraph 3<sup>rd</sup> sentence that starts with "Canyon Fuel Co." Sufco drilled 5 wells in 2009 with completed depths of 168 to 228 feet below the surface. Water levels in the wells are approximately 150 feet below the surface. The aquifer is approximately 55 feet below the elevation of the Pines 105 spring.

2<sup>nd</sup> paragraph 4<sup>th</sup> sentence that starts with "As a result" Sufco is proposing to complete wells near the spring sites, Pines 105, Joes Mill Pond, and the 310/311 area, not at each of the exploratory wells drilled.

3<sup>rd</sup> paragraph, Sufco would like to note that subsurface soils are not yet dry. This is demonstrated by the presence of water in many of the piezometers as well as vegetation (willows) that has been documented within the area that has been excluded from grazing at Pines 105.

3<sup>rd</sup> paragraph 3<sup>rd</sup> sentence that starts with "Leland Roberts" The white Pipe (piezometer) initially moved as one with the bedrock that was subsided, on average the piezometers have moved approximately .6 feet since installation. The black pipe (casing) has moved in addition to subsidence, approximately .46 feet, for a total average elevation change of 1.06 feet. This demonstrates that some of the soils in the area are no longer saturated causing them to collapse. This is due both to climatic conditions (drought) as well as the loss of surface flow in Pines 105 and 310/311 area.

#### 14. Subsidence Control

Sufco is unclear as to the location of the surface water losses that this section refers to. Loss of surface flow in the main stem of the East Fork of Box Canyon was repaired by the summer of 2007. Hydrologic monitoring demonstrates that surface flows have returned to pre-mining conditions.